

IN THE UNITED STATE DISTRICT COURT FOR THE NORTHERN
DISTRICT OF ALABAMA, SOUTHERN DIVISION

HARTFORD LIFE AND ACCIDENT)	(
COMPANY)	(
)	(
)	(CASE NUMBER:
PLAINTIFF)	(2:20-cv-01383 GMB
)	(
VS)	(
)	(
)	(
HENREITTA BROWN, CRYSTAL BROWN,)	(
ET AL)	(
)	(
DEFENDANTS)	(

**DEFENDANT HENREITTA BROWN'S ANSWER TO COMPLAINT FOR
INTERPLEADER**

COMES NOW, the Defendant, Henreitta Brown, through her attorney of record, Patrice Blankenship, Esq. and submits this answer and hereby states the following:

1. That Henreitta Brown is the surviving spouse of the decedent, Ricky Brown.
2. That the decedent was insured by the Plaintiff under a group life insurance policy issued by his

employer Timco Aviation Services, Inc. in the aggregate amount of \$264,000.00.

3. That on July 24, 2013, the decedent executed a beneficiary designation form which was then presented to his employer's Human Resources department.
4. The decedent's beneficiary designation document identifies the Defendant Henreitta Brown as his wife and directs that 70% of the insurance policy proceeds be paid to her.
5. That the Defendant, Henreitta Brown is one of the named beneficiaries under the insured's policy and that there exists no legal basis for delay or denial of payment of such proceeds in accordance with the decedent's designation.

WHEREFORE PREMISES CONSIDERED, the Defendant, Henrietta Brown would request the Court grant the following relief:

- a. That the insurance proceeds designated to be paid to the Defendant, Henreitta Brown be immediately

disbursed in accordance with the policy terms and the express direction of the decedent.

b.To deny the Plaintiff's request to enjoin the Defendant from any future claims against the Plaintiff.

c.To deny the Plaintiff's request to be awarded attorney's fees and costs.

d.To grant to the Defendant, Henreitta Brown any other relief to which she may be entitled.

Respectfully Submitted

/s/ Patrice Blankenship
Patrice Blankenship, Esq.
Attorney for Defendant,
Henreitta Brown

Of Counsel

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Certificate of Service

This is to certify that a copy of the foregoing has been served upon counsel for the Plaintiff by the PACER electronic filing system.

Dated this the 6th day of September, 2020.

/s/Patrice Blankenship
Patrice Blankenship, Esq.